

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA

MATTHEW BRADLEY,

Plaintiff,

Docket No. 5:19-cv-249-FL

- against -

ANALYTICAL GRAMMAR, INC.

Defendant.

ANSWER TO COUNTERCLAIM

Plaintiff Matthew Bradley hereby submits his answer and defenses to Defendant Analytical Grammar, Inc's counterclaim.

1. Admit.
2. Admit that Bradley posted a photograph to Facebook on December 8, 2017 and that he initiated a lawsuit on June 18, 2019 but denies the remainder of the allegations.
3. Denied.
4. Admits that there is a dispute; denies the remainder of the allegations.
5. Admits that there is a dispute; denies the remainder of the allegations.
6. Admit
7. Admit
8. Admit
9. Admit.
10. Admit

11. Admit

12. Admit

13. Denied.

14. Denied.

15. Admit

16. Denied.

17. Denied.

18. Admit.

19. Admit

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Denied

29. Denied

30. Denied

PRAYER FOR RELIEF

Defendant's prayer for relief should be denied in its entirety

AFFIRMATIVE DEFENSES

1. Failure to State a Claim. Defendant's declaratory judgment action sets forth superfluous claims that simply mirror its defenses to Plaintiff's primary action under the Copyright Act and DMCA. These retaliatory actions should be dismissed as duplicative, unnecessary and burdensome because the same relief is available to Defendant by simply defending Plaintiff's principal claims.

Dated: Valley Stream, New York
October 4, 2019

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